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The Honorable Ronald B. Leighton  
United States District Judge

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JUDITH COX and CHARLES COX individually  
and as Personal Representatives of the Estates of  
C.J.P. and B.T.P.,

Plaintiffs,

v.

STATE OF WASHINGTON, DEPARTMENT  
OF SOCIAL AND HEALTH SERVICES,  
FOREST JACOBSON, ROCKY  
STEPHENSON, JANE WILSON, and BILLIE  
REED-LYYSKI,

Defendants.

NO. 14-05923RBL

**SUPPLEMENTAL DECLARATION OF  
EVAN BARIAULT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT AND IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

I, Evan Bariault, hereby declare as follows:

1. I am an attorney of record for plaintiffs. I make this supplemental declaration based  
on personal knowledge and am competent to testify to the matters contained herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the deposition  
of Detective Gary Sanders.

SUPPLEMENTAL DECLARATION OF EVAN  
BARIAULT - 1  
{00155451;1}

FREY BUCK, P.S.  
1200 FIFTH AVENUE, SUITE 1900  
SEATTLE, WA 98101  
P: (206) 486-8000 F: (206) 902-9660

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the deposition of the children's guardian *ad litem*, Julio Serrano.

4. Attached hereto as Exhibit 3 is a true and correct copy of documents contained in Terrica and Steven Powell's divorce file.

I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Evan Bariault  
Evan D. Bariault, WSBA #42867

SUPPLEMENTAL DECLARATION OF EVAN  
BRIAULT - 2

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**Certificate of Service**

I certify that on the date noted below I electronically filed this document entitled with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

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Attorneys for Plaintiffs

DATED this 23rd day of September, 2015, at Seattle, Washington.

/s/ Evan Bariault

SUPPLEMENTAL DECLARATION OF EVAN  
BRIAULT - 3

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